

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D., and STEPHEN NILL,

Defendants.

MICHELLE TREBITSCH, On Behalf Of
Herself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

INFORMATION DYNAMICS, LLC, On
Behalf of Itself and All Others Similarly
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.
JONES, EDWARD N. HARRIS, J.
MICHAEL O'HARA, HASSAN M.
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10294 DPW

Civil Action No. 04-CV-10307 DPW

Civil Action No. 04-CV-10308 DPW

[Additional Captions Follow on Next Page]

**JAMES M. BROWER'S MOTION FOR
CONSOLIDATION, APPOINTMENT AS LEAD
PLAINTIFF, AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

PETER KALTMAN, On Behalf of Himself and All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10309 DPW

v.

SONUS NETWORKS, INC., RUBEN GRUBER, HASSAN AHMED and STEPHEN NILL,

Defendants.

SAMANTHA DEN, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10310 DPW

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

RICHARD CURTIS, Individually And on Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10314 MLW

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

[Additional Captions Follow on Next Page]

RONALD KASSOVER, on Behalf of the
Ronald Kassover IRA and All Others
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

STEVE L. BAKER, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10329 DPW

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. and STEPHEN NILL,

Defendants.

MICHAEL KAFFEE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10333 DPW

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10345 DPW

[Additional Captions Follow on Next Page]

HAIMING HU, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-10346 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D., and STEPHEN NILL,

Defendants.

CHARLES STARBUCK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10362 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D., and STEPHEN NILL,

Defendants.

SAMUEL HO, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

Civil Action No. 04-CV-10363 DPW

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL.,

Defendants.

[Additional Captions Follow on Next Page]

JEFFREY C. RODRIGUES, Individually
and On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10364 DPW

ROBERT CONTE and MARK RESPLER,
Themselves and On Behalf of All Others
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10382 DPW

WHEATON ELECTRICAL SERVICES
RETIREMENT 401K PROFIT SHARING
PLAN, On Behalf of Itself and All Others
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN
AHMED, and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10383 DPW

[Additional Captions Follow on Next Page]

BRIAN CLARK, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R. JONES, EDWARD N. HARRIS, J. MICHAEL O'IIARA, HASSAN M. AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10454 DPW

SHEILA BROWNELL, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV- 10597 DPW

SAVERJO PUGLIESE, On Behalf of Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M. AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10612 DPW

[Additional Captions Follow on Next Page]

DAVID V. NOCITO, On Behalf of
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10623 DPW

James M. Brower, by his counsel, hereby respectfully moves this Court to:

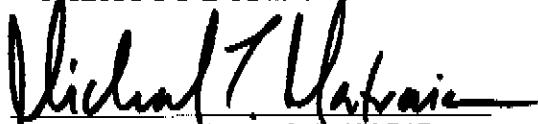
(i) consolidate all related actions; (ii) be appointed Lead Plaintiff in the consolidated securities class action; and (iii) approve his selection and retention of Berman DeValerio Pease Tabacco Burt & Pucillo as Lead Counsel.

In support of this Motion, Plaintiff submits herewith a Memorandum of Law, the Declaration of Michael T. Matraia, and a Proposed Order.

Dated: April 12, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**



Jeffrey C. Block, BBO # 600747
Michael T. Matraia, BBO # 633049
Nicol R. Starr, BBO #654848
One Liberty Square
Boston, Massachusetts 02109
(617) 542-8300

**Attorneys for Plaintiff James M. Brower
and Proposed Lead Counsel**

Eduard Korsinsky
Zimmerman Levi & Korsinsky, LLP
39 Broadway, Suite 1440
New York, NY 10006
(212) 363-7500

Sonus/dp/LP_Motion